

Amy P. Lally (SBN 198555)
alally@sidley.com
Ellyce R. Cooper (SBN 204453)
ecooper@sidley.com
SIDLEY AUSTIN LLP
1999 Avenue of the Stars, 17th Floor
Los Angeles, CA 90067
Telephone: +1 310 595-9500
Facsimile: +1 310 595-9501

Mark Rosenbaum (SBN 59940)
mrosenbaum@publiccounsel.org
Judy London (SBN 149431)
jlondon@publiccounsel.org
Talia Inlender (SBN 253796)
tinlender@publiccounsel.org
Alisa Hartz (SBN 285141)
ahartz@publiccounsel.org
Lucero Chavez (SBN 273531)
lchavez@publiccounsel.org
PUBLIC COUNSEL
610 S. Ardmore Avenue
Los Angeles, CA 90005
Telephone: +1 213 385-2977
Facsimile: +1 213 385-9089

Attorneys for Plaintiffs
Additional Counsel on next page

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MS. J.P., MS. J.O., AND MS. R.M., on
behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

JEFFERSON B. SESSIONS III,
ATTORNEY GENERAL OF THE
UNITED STATES; KIRSTJEN
NIELSEN, SECRETARY OF
HOMELAND SECURITY; U.S.
DEPARTMENT OF HOMELAND
SECURITY, AND ITS SUBORDINATE
ENTITIES; U.S. IMMIGRATION AND
CUSTOMS ENFORCEMENT; U.S.

Case No. 2:18-cv-06081 -JAK-SK

**DECLARATION OF LUCERO
CHAVEZ**

Date: September 20, 2018

Time: 1:30 p.m.

Judge: Hon. John A. Kronstadt

Courtroom: 10B

CUSTOMS AND BORDER
PROTECTION; ALEX M. AZAR II,
SECRETARY OF HEALTH AND
HUMAN SERVICES; U.S.
DEPARTMENT OF HEALTH AND
HUMAN SERVICES; SCOTT LLOYD,
DIRECTOR OF THE OFFICE OF
REFUGEE RESETTLEMENT; OFFICE
OF REFUGEE RESETTLEMENT;
DAVID MARIN, LOS ANGELES FIELD
OFFICE DIRECTOR, U.S.
IMMIGRATION AND CUSTOMS
ENFORCEMENT; LISA VON
NORDHEIM, WARDEN, JAMES A.
MUSICK FACILITY; MARC J. MOORE,
SEATTLE FIELD OFFICE DIRECTOR,
U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT; LOWELL CLARK,
WARDEN, TACOMA NORTHWEST
DETENTION CENTER,

Defendants.

Carter G. Phillips*
cphillips@sidley.com
Jennifer J. Clark*
jennifer.clark@sidley.com
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, D.C. 20005
Telephone: +1 202 736-8000
Facsimile: +1 202 736-8711

Mark E. Haddad (SBN 205945)
markhadd@usc.edu
Part-time Lecturer in Law
USC Gould School of Law**
University of Southern California
699 Exposition Blvd.
Los Angeles, CA 90089
Telephone: +1 213 675-5957

Michael Andolina*
mandolina@sidley.com
Timothy Payne*
tpayne@sidley.com
Kevin Fee*
kfee@sidley.com
SIDLEY AUSTIN LLP
One South Dearborn
Chicago, IL 60603
Telephone: +1 312 853-7000
Facsimile: +1 312 853-7036

Luis Cortes Romero (SBN 310852)
lcortes@ia-lc.com
Alma L. David (SBN 257676)
adavid@ia-lc.com
IMMIGRANT ADVOCACY &
LITIGATION CENTER, PLLC
19309 68th Avenue South, Suite R-102
Kent, WA 98032
Telephone: +1 253 872-4730
Facsimile: +1 253 237-1591

DECLARATION OF LUCERO CHAVEZ

1 Sean A. Commons (SBN 217603)
2 scommons@sidley.com
3 Bridget S. Johnsen (SBN 210778)
4 bjohnsen@sidley.com
5 SIDLEY AUSTIN LLP
6 555 West Fifth Street
7 Los Angeles, CA 90013
8 Telephone: +1 213 896-6000
9 Facsimile: +1 213 896-6600
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**Admitted pro hac vice*

*** Institution listed for identification purposes only*

DECLARATION OF LUCERO CHAVEZ

DECLARATION OF LUCERO CHAVEZ

1
2 1. I, Lucero Chavez, make this declaration based on my own personal
3 knowledge, and if called as a witness, I could and would testify to the following matters:

4 2. I am an attorney licensed to practice law in the State of California. I am a
5 senior staff attorney in the Immigrants' Rights Project at Public Counsel in Los Angeles,
6 California. I have been practicing in immigration law for 7.5 years.

7 3. I represent J.P. in this lawsuit, and I conducted an interview with her on
8 August 17, 2018. J.P. speaks the Mayan dialect of Q'eqchi' and understands very little
9 Spanish and no English. J.P. does not know how to read or write. I spoke to J.P. through
10 a Q'eqchi' interpreter. The interpreter was on the telephone and was a professional
11 interpreter through a private translation service

12 4. J.P. and her fifteen-year-old daughter L.P. traveled to the United States
13 together, but were apprehended and separated on or around May 21, 2018. Because of
14 J.P.'s language limitations, throughout their journey to the United States, L.P. served as
15 J.P.'s interpreter and voice until J.P. and her daughter were separated by immigration
16 officials.

17 5. While she was in detention, J.P. was not given any documents in her dialect
18 and was not taken to see anyone who spoke her dialect. J.P. did not receive any mental
19 health screening form. J.P. was not offered any assistance by detention center staff in
20 even being able to contact her daughter let alone in accessing mental health services to
21 deal with the trauma of having her daughter taken from her. J.P. tells me that the only
22 people who helped her were the attorneys who came to see her.

23 6. When J.P. was finally reunited with her daughter, both were sobbing. J.P.
24 tells me she tries not to remember the time she was separated from her daughter because
25 it hurt her so much. She continues to be scared of being separated from her daughter
26 again.

27 7. When J.P. thinks about her forceful separation from her daughter, it pains
28 her, she tells me it makes her very sad to think about. When she thinks about her
immigration court case, she is scared that officials will once again take L.P. from her

1 without telling her what is going to happen or whether she will see her again. J.P. still
2 feels anxious about the separation, her words quicken as she describes her need to be
3 with her daughter and slows and drops in volume when she recounts the separation.

4
5 I declare under penalty of perjury under the laws of the United States that the foregoing
6 is true and correct.

7
8 Executed on August 22, 2018 at Los Angeles, California.

9
10
11 

12 Lucero Chavez.
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28